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Subject: Draft Ozone Guidance - Review Requested
Attachments: Draft O3D Guidance_1-15-16_coregulator review.pdf

Dear State Air Directors,

On October 1, 2015, the EPA strengthened the National Ambient Air Quality Standards for ozone. At that time, the EPA indicated that, in early 2016, it would issue updated guidance on the initial area designation process to assist states and tribes in developing their designation recommendations. Attached is a copy of the draft designations guidance for the 2015 ozone NAAQS that we are providing to state and tribal co-regulator representatives for informal review. Please be aware that this draft document is intended solely for co-regulator review and is not intended for distribution to a wider audience.

The EPA's primary objective in offering this informal review opportunity is for air agencies to provide feedback and for the EPA to consider air agencies' perspectives before the EPA finalizes the guidance document. The EPA does not plan to formally respond to comments received during this review process. In two weeks, we will host a 2-hour listening session by conference call during which you are invited to share with EPA personnel your comments and any concerns regarding the draft guidance. Details are provided at the end of this email. We anticipate finalizing the guidance within a few weeks after the listening session.

Our anticipated schedule for the guidance is as follows:

- **Monday, January 25, 2015** - Distribute draft ozone designations guidance to co-regulators.
- **Tuesday, February 9, 2016** - Conference call listening session with co-regulators regarding draft designations guidance.
- **End of February** - Distribute final designations guidance.
- **March 2016** - Webinar(s) with states/tribes to discuss the guidance and technical information to support designations.

The attached draft guidance provides information on the schedule and process for designating areas for the 2015 revised ozone NAAQS. Similar to past area designations guidance, the guidance identifies factors that the EPA will evaluate in making final nonattainment areas boundary decisions and that we encourage states and tribes to consider as they make their recommendations for area designations. The draft guidance includes 3 attachments that provide additional detail regarding the EPA's data review and decision-making process. Attachment 1 is an anticipated timeline of important milestones in the initial area designations process. Attachment 2 identifies the promulgated exceptional event schedule for initial data flagging and submission of exceptional event demonstrations. Attachment 3 provides information on the five designation factors and provides guidance regarding analyses relevant to support each of the factors. Attachment 3 also provides information on conducting an analysis to support a request that a nonattainment area be treated as a Rural Transport Area.

We request that reviewers consider the following questions as they review the draft guidance:

- Is the guidance clearly focused on our desired outcome (a reasoned weight-of-evidence recommendation)? Do you know what the EPA expects?
- Is the guidance complete? (E.g., is there a data source or analytical technique that the air agency intends to apply that is not covered?)

We will hold the listening session to hear your feedback and perspectives before finalizing the guidance. The session will be held on **February 9, 2016** from **2:00 - 4:00 p.m. EST on conference line** Conference Line/Code / Ex. 6 **(conference code** Conference Line/Code / Ex. 6 **).**

Thank you,

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